



Association of Food and Drug Officials

P.O. Box 3425 • York, PA 17402
Telephone (717)757-2888 • Fax (717)755-8089
E-Mail • afdo@blazenet.net

President

R. D. (Dan) SOWARDS
TX Dept. of Health
1100 W. 49th Street
Austin, TX 78756-3189
(512) 719-0243
FAX (512) 719-0263
dan.sowards@tdh.state.tx.us

President-Elect

STEVE STEINHOFF
WI Dept. of Agriculture
Box 8911
Madison, WI 53708
(608)224-4701
FAX (608)224-4710
steinsb@wheel.datcp.
state.wi.us

Vice-President

R. D. (Doug) SAUNDERS
VA Dept. of Agriculture
1100 Bank Street, Rm 502
Richmond, VA 23219
(804) 786-8899
FAX (804) 371-7792
risaunders@vdacs.state.va.
.us

Secretary-Treasurer

TERENCE MACAIG
VT Dept. of Health
Env. Health Division
P.O. Box 70
Burlington, VT 05402
(802) 863-7227
FAX (802) 863-7425
tmacaig@vdh.state.vt.us

Director of Public Policy

BETSY B. WOODWARD
1238 Sedgfield Road
Tallahassee, FL 32311
(850) 878-7440
FAX (850) 878-1763
betsy_woodward@hotmail.com

Training Director

JAMES L. SEVCHIK
8057 Highland Farms Dr.
East Amherst, NY 14051
(716) 636-0409
jsevchik@msn.com

Executive Director

DENISE C. ROONEY
Association of Food and
Drug Officials
P.O. Box 3425
York, PA 17402
(717) 757-2888
FAX (717) 755-8089
afdo@blazenet.net

April 19, 2000

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Dockets Management Branch
U.S. Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. 00N-1061

Dear Sir/Madam:

The Board of Directors of the Association of Food and Drug Officials (AFDO), wishes to provide the agency and the Office of Management and Budget with our support for the *Resource Assessment Survey* recommended by the Roles and Responsibilities Work Group under the National Food Safety System.

AFDO is the primary association of federal, state, and local regulatory officials in the U.S., responsible for the safety of foods, drugs, and medical devices manufactured and distributed in this country. The Association is now 104 years old and is known for the development of model laws, regulations, and guidance documents utilized by state and local officials for the protection of our citizens from adulterated and misbranded commodities mentioned above. As such, we believe, as the intended targets for the *Resource Assessment Survey*, that this survey is sorely needed in order to promote uniformity and eliminate gaps and overlaps in our current food safety system in the U.S.

For the past three years AFDO has advocated a plan for a *nationally integrated food safety system* which predates the President's Food Safety Initiative. AFDO's plan included the development of such a resource assessment tool. In fact, many of the informational questions reflected in the proposed survey originated in a draft of a proposed AFDO resource assessment survey, which was utilized by the NFSS Work Groups in the development of the assessment tool FDA may propose.

AFDO believes there must be adequate federal oversight of state food inspection programs, along with adequate state oversight of local food inspection programs. We also believe in the concept of inspector certification, specific core capacities for state and local food inspection programs and laboratories, minimum performance standards, laws, and regulations, and adequate enforcement of food safety regulations. In order for the FDA and other federal agencies involved in food safety to determine where federal resources need to be utilized and what additional funding may be needed, these agencies must be able to determine the current capacities and

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Comments on Docket No. 00N-1061

April 19, 2000

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abilities of their state and local counterparts. Currently the states conduct over 90 percent of all inspections of food manufacturers and wholesale food distributors in the U.S., outside of the mandatory inspections conducted by USDA/FSIS for meat and poultry processors. The federal agencies and the public need assurances that those state and local programs engaged in food inspection activities have the funding, capacity, training, and laws/regulations to fulfill those responsibilities. Such a survey as that proposed by this *Federal Register* notice will enable the federal agencies to make these determinations.

Where state programs are found to fall short, the federal agencies will be able to ensure adequate inspectional coverage through either filling the holes themselves, or through additional funding to bring these state programs up to standards which are acceptable to the federal agencies and to the public. At the same time, it may be used to assure the federal agencies and the public that inspections conducted by specific state and local programs are indeed equivalent to federal inspections.

In conclusion, we as the subject of this proposed survey find that the survey is both necessary and appropriate. We stand ready to assist the federal agencies in completion of the surveys where deemed appropriate.

These comments do not reflect any bias on the part of AFDO as a potential contractor for conducting the proposed survey.

Respectfully submitted,

R. D. (Dan) Sowards

President

Association of Food and Drug Officials

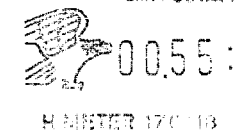
cc: AFDO Board of Directors

AFDO Office

Joseph A. Levitt, Director, Center for Food Safety and Applied Nutrition,
U.S. Food and Drug Administration



ASSOCIATION OF FOOD AND DRUG OFFICIALS
2550 KINGSTON ROAD, SUITE 311
YORK, PA 17402



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THE INFORMATION YOU REQUESTED IS ENCLOSED